

EXHIBIT 115

Mary Erdoes

1 UNITED STATES DISTRICT COURT FOR THE
2 SOUTHERN DISTRICT OF NEW YORK

3 -----X

4 Jane Doe 1, individually and on behalf of
all others similarly situated,

5

6 Plaintiff,

Case No.

1:22-cv-10019 (JSR)

7 v.

8 JPMorgan Chase Bank, N.A.,

Defendant.

9 -----

10 GOVERNMENT OF THE UNITED STATES

VIRGIN ISLANDS,

11

Case No.

1:22-cv-10904 (JSR)

12 Plaintiff,

13 v.

14 JPMORGAN CHASE BANK, N.A.,

15 Defendant

16 -----

17 ** CONFIDENTIAL PORTION UNDER SEPARATE COVER **

18 ** DEPOSITION OF MARY ERDOES **

19 Wednesday, March 15, 2023

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21

22

23 Reported by:

24 Angela M. Shaw-Crockett, CCR, CRR, RMR

Mary Erdos

1 Q. How was it that you were involved in 2013?
2 Why is it that in 2013 you do get
3 involved?

4 A. I remember being part of the
5 high-risk-client review with Mr. Epstein's account
6 during the summer of 2013, and Jes Staley was no
7 longer at the firm, and Jes Staley was the most
8 senior client coverage person for Mr. Epstein.

9 And there was no one there to vouch for
10 Mr. Epstein. And I made the decision that it was --
11 we were exiting the relationship with Mr. Epstein.

12 Q. You mentioned cash withdrawal activities
13 in his account.

14 Was that something new in 2013, or do you
15 know whether that occurred in earlier years as well?

16 A. I remember, in 2013, going in-depth on the
17 client analysis, the relationship with Mr. Epstein,
18 asking a lot of questions and recognizing that there
19 were large cash outflows. And we promptly exited
20 the account thereafter.

21 Q. You mentioned media reports; that is, that
22 you said it was activities in his accounts -- and, I
23 guess, those are the cash withdrawals.

24 What media reports were you referring to?

Mary Erdos

1 Did you take some comfort prior to 2013,
2 by having Mr. Staley as his sponsor, that these
3 issues -- well, withdrawn.

4 What did you mean by "He no longer had
5 Mr. Staley to be his sponsor in the bank"?

6 A. Mr. Staley was Mr. Epstein's advocate in
7 the bank and was the senior relationship manager for
8 Mr. Epstein. And so I just wasn't involved in those
9 conversations. And without someone there,
10 advocating for Mr. Epstein and the situation that I
11 viewed, I was exiting Mr. Epstein.

12 Q. Do you know whether Justin Nelson was
13 advocating on behalf of Mr. Epstein?

14 A. I don't recall Mr. Nelson being part of
15 the conversation.

16 Q. Okay. Do you recall whether there was
17 anybody else in 2013 that was advocating for his
18 termination other than you?

19 A. I don't recall who was in the meetings,
20 but I recall it was a group of people.

21 Q. Last part of that email, which is
22 Exhibit 30, says "Agree. We'll work on those this
23 weekend for us to knock back and forth."

24 Do you remember receiving anything further

Mary Erdos

1 A. No.

2 Q. It's not something that you would ever
3 hope anyone at the bank would condone, right?

4 A. Correct.

5 Q. And if the bank was aware or became aware
6 that Jeffrey Epstein was abusing young girls or
7 women, you would recommend that he be terminated as
8 a client at the bank, correct?

9 A. I wasn't -- I wasn't part of those
10 conversations, and there's -- those conversations
11 have lots of facts and circumstances around them.
12 So it would just -- it would depend.

13 Q. I must have asked a bad question. So my
14 question is hypothetically, if you were to learn and
15 believe that Jeffrey Epstein was sexually abusing
16 children and young women, would it be your position
17 that Jeffrey Epstein should be terminated as a
18 client at the bank?

19 A. If I learned and believed that he was
20 sexually abusing young children, yes, he would be --
21 I would ask to have him exited from the bank.

22 Q. And if you hypothetically learned that
23 Jeffrey Epstein was running a particular type of
24 sexual abuse scheme where he was inviting young

Mary Edwards

1 hush payments to victims and recruiters and things
2 of that nature, correct?

3 A. Those two things, unfortunately, never
4 came together in my mind.

5 Q. Okay. It's not until right now that we're
6 having this discussion that things are kind of
7 starting to -- the puzzle is coming together?

8 MR. JOHNSON: Objection.

9 You can answer.

10 A. At the time, the concern was the cash
11 payments, and at the time, the cash payments were
12 related to airplane usage.

13 And never at the time was that something
14 that I was connecting in my mind with anything to do
15 with any of the allegations of what he may or may
16 not have done, and I wasn't aware of any ongoing
17 things that Mr. Epstein was doing, and the two
18 things never -- they never came to my mind to
19 connect them.

20 BY MR. EDWARDS:

21 Q. With respect to the cash payments, if you
22 believed that he was withdrawing cash because that's
23 the way -- that's the way it was necessary to make
24 payments for jet fuel, that's not somebody that you

Mary Erdos

1 the specifics were.

2 Q. When you were hearing the allegations over
3 time, let's say -- do you remember when
4 Jeffrey Epstein was first arrested in 2006?

5 A. Yes.

6 Q. And because of the nature of the charges,
7 that it's allegedly sex with minors, that's a big
8 deal, right, for a client?

9 A. Any allegation is taken very seriously.

10 Q. But if it's an allegation of trespassing,
11 it's taken less seriously than sex with a minor?

12 A. I can't judge the seriousness with which
13 they take it.

14 Q. Okay. Did you speak with Jes Staley in
15 the 2006 time period about the fact that
16 Jeffrey Epstein had been arrested?

17 A. I remember Jes discussing that -- I sort
18 of don't know where or when -- that his
19 characterization of Jeffrey was very different than
20 the press situation. And -- yeah, that's what I
21 remember.

22 Q. Did you know that Jes was going to visit
23 Jeffrey at various houses of his?

24 A. So I remember the email that I think we